

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

John Doe and Jane Doe,

Plaintiffs,

vs.

Court File No. 07-cv-02190 (DSD/SRN)

Shaun E. LaDue, individually and in his
official capacity as Chief of Police of
the Owatonna Police Department;
Ricardo Magana, individually and in
his official capacity; Tim Hassing,
individually and in his official capacity;
Mike Earl, individually and in his
official capacity; Willie Goodsell,
individually and in his official capacity;
Jay Matejcek, individually and in his
official capacity; John Roes I through V
individually and in their official
capacities; and the City of Owatonna;

Defendants.

**MOTION FOR PRELIMINARY
INJUNCTION**

Plaintiffs John Doe and Jane Doe, by and through their undersigned counsel, move the court pursuant to Federal Rule of Civil Procedure 65(a) for a preliminary injunction enjoining Defendants, in checking or verifying John Doe's compliance with Minn. Stat. § 243.166, from requiring or subjecting John Doe or Jane Doe to anything beyond the requirements specifically authorized by § 243.166 including the following:

- a. Requiring John Doe to have in person contact with any law enforcement authority;
- b. Requiring John Doe to submit to random photographing of his person;

- c. Requiring John Doe or Jane Doe to submit to random photographing of their vehicles; and
- d. Prohibiting Defendants or other officers of the Owatonna Police Department from making direct visits to the Does' residence each quarter as part of the Owatonna Police Department's purported efforts to enforce Minnesota Statute § 243.166.

This motion is based upon the court file and all records contained therein, upon the Affidavit of Frederick J. Goetz and all documents attached thereto, upon the Affidavits of John Doe, Jane Doe, and Wayne A. Logan; and upon the argument of counsel at the hearing on this motion.

DATED: June 20, 2007.

GOETZ & ECKLAND P.A.

By: s/Frederick J. Goetz
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